

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	(Judge )
	)	
2017 TESLA MODEL X	)	
VIN: EYJXCAE2XHF052027,	)	
	)	
Defendant.	)	(Electronically filed)

**COMPLAINT FOR FORFEITURE *IN REM***

Plaintiff, the United States of America, by and through its attorneys, Gerard M. Karam, United States Attorney for the Middle District of Pennsylvania, and Sean A. Camoni, Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF THE ACTION**

1. Plaintiff, United States of America, alleges the following upon information and belief for its claim against the defendant property for violations of **18 U.S.C. § 371** (conspiracy to commit an offense against the United States) and **18 U.S.C. § 1956(h)** (money laundering conspiracy), and seeks forfeiture pursuant to **18 U.S.C. § 981**.

**THE DEFENDANT *IN REM***

2. The defendant property consists of the following vehicle that has been seized from in and around the driveway of 1512 Bursera Terrace, Hollywood, FL 33021 on June 7<sup>th</sup>, 2023, with the owner listed as Lena Panin, and is presently in federal custody pursuant to a seizure warrant signed by Magistrate Judge Martin C. Carlson on June 6, 2023:

- a. a 2017 TESLA MODEL X bearing Vehicle Identification Number (VIN): EYJXCAE2XHF052027.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a). This Court also has jurisdiction over this particular action under 18 U.S.C. § 981(a)(1)(C).

4. This Court has *in rem* jurisdiction over the defendant property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

6. As provided by Supplemental Rule G(4), the United States will serve notice of this action on “any person who reasonably appears to be a potential claimant on the facts known to the government before the end of the time for filing a claim under Rule G(5)(a)(ii)(B).”

### **BASIS FOR FORFEITURE**

7. The defendant property is subject to forfeiture pursuant to 18 U.S.C. § 981 because it constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 371 (conspiracy to commit an offense against the United States) and 18 U.S.C. § 1956(h) (money laundering conspiracy).

### **FACTS**

8. All of the facts alleged in this Complaint are based upon information and belief, the source of which are Kevin Kuntz, Special Agent with the Homeland Security Investigations agency, resulting from an investigation into the fraud activity of Anton Panin, Lena Panin, and associates.

9. The 2017 Tesla Model X, bearing the Florida vanity plate GEE GYM, bearing Vehicle Identification Number (VIN) 5YJXCAE2XHF052027, was identified as the asset for which \$43,185.87 in payments were made to TD Auto.

10. It is believed that the \$43,185.87 in United States currency paid to TD Auto by Lena Panin in exchange for the Tesla Model X was comprised of criminal proceeds.

11. The criminal enterprise that Anton Panin headed, XO Companions, was in operation from approximately 2015 until June 2023. In that time, Anton Panin and his wife, Lena Panin, did not have another legitimate source of income.

12. XO Companions, also referred to as "XOC," was a commercial prostitution enterprise operated by Anton Panin and co-defendants, Jennie Lawson, Tracey Lawson, and Viktoriia Zakirova. Panin resided in the Southern District of Florida; the Lawsons resided in the Middle District of Pennsylvania; Zakirova lived abroad before relocating to the Southern District of Florida. Panin and Zakirova recruited women in Russia and Eastern Europe to travel to the United States to work as prostitutes for XO Companions and funded their travel to do so. The Lawsons scheduled appointments between prostitutes and XOC customers in major cities around the United States. Cash proceeds of the XOC enterprise were mailed to the Lawsons, who transported the funds from Pennsylvania to Panin in Florida. It is alleged that Panin would then deposit this cash into

various accounts belonging to himself, Lena Panin, and others. Anton Panin and three of his employees were indicted under case number 1:23-CR-148 and charged with violations of 18 U.S.C. § 371 and 18 U.S.C. §§ 1956(h) (money laundering conspiracy) and 1956(a)(1)(B)(i) (money laundering).

13. Criminal proceeds from the operation of XO Companions were laundered in part through a commercial gymnasium business called Gee Gym, opened in 2019 under Lena Panin's name. Gee Gym utilized criminal proceeds to fund the initial purchase of gym equipment and proceeds from the operation of Gee Gym were commingled with criminal proceeds of XO Companions from the inception. Some of those proceeds were deposited in accounts belonging to Lena Panin and were later used to fund payments for Lena Panin's personal vehicles.

14. Payments for the Tesla were primarily made from Lena Panin's Wells Fargo account ending in -1103. At least two additional payments came from other accounts in Lena's name (Citibank -8181 and Bank of America -1263).

15. Cash deposits and/or transfers of criminal proceeds to Lena's account ending in -1103 were made just prior to her TD Auto payments.

For example, there was a \$950 cash deposit on February 6, 2018, into Lena's Wells Fargo account ending in -1103, and a payment to TD Auto Finance of \$841.83 was made on February 12, 2018, from the same account.

16. Additionally, investigators identified multiple transfers from LP Esthetics (originally funded by cash deposits representing criminal proceeds) to Lena's Wells Fargo account ending in -1103, and payments to TD Auto from that account occurred after the transfers.

17. Additionally, the Tesla is alleged to have been used as part of the criminal enterprise of XO Companions as a "pick-up vehicle" for packages of cash representing criminal proceeds.

18. Based upon these facts, the Tesla Model X constitutes 1) proceeds of criminal violations of 18 U.S.C. §§ 371 and 1956(h); and 2) property that facilitated violations of 18 U.S.C. § 371 and 1956(h), and is therefore subject to forfeiture.

**CLAIM FOR RELIEF**

WHEREFORE the United States prays that a warrant of arrest be issued for the defendant property, that the defendant property be forfeited to the United States, that the plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as the Court deems proper and just.

Respectfully submitted,

GERARD M. KARAM  
UNITED STATES ATTORNEY

By: /s/Sean A. Camoni  
SEAN A. CAMONI  
Assistant U.S. Attorney  
235 N. Washington Avenue, Ste. 311  
Scranton, PA 18503  
Phone: 570-348-2800  
Fax: 570-348-2037  
sean.a.camoni@usdoj.gov

**VERIFICATION**

I, Special Agent Kevin Kuntz, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Homeland Security Investigations agency, that I have read the foregoing verified Complaint *in Rem* and know the contents thereof, and that the matters contained in the verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of Homeland Security Investigations.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: October 3, 2023

*/s/ Kevin Kuntz*  
Kevin Kuntz  
Special Agent  
Homeland Security Investigations